

**Exhibit 1**

**Proposed Order**

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

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In re:

SAMMY ELJAMAL,

Debtor.  
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Chapter 11

Case No. 15-22872 (RDD)

**ORDER AUTHORIZING DISCOVERY PURSUANT TO  
RULE 2004 OF THE FEDERAL RULES OF BANKRUPTCY PROCEDURE**

Upon the *ex parte* application (the “Application”)<sup>1</sup> of Stephen S. Gray, not individually but solely in his capacity as the Chapter 11 trustee (the “Trustee”) of the estate of Sammy ElJamal (the “Debtor”) in the above-captioned case, for an order authorizing the issuance of subpoenas for the production of documents and information and deposition testimony; and good and sufficient cause for the relief sought in the Application exists, it is hereby:

**ORDERED**, that the Application is granted; and it is further

**ORDERED**, that the Trustee is authorized to issue subpoenas for the production of documents and for deposition testimony consistent with Rule 9016 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”), concerning any asset, liability, duty, obligation, contract, transaction, or other issue related in any way to the Debtor, including those related in any way to any distributions realized by the Debtor, whether or not such distributions were actually received, from entities that the Debtor owned or owns and/or operates including, upon: current and former professionals retained by the Debtor, financial institutions used by the Debtor (or affiliated entities), business partners of the Debtor, and affiliated entities (among others); and it is further

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<sup>1</sup> Capitalized terms not defined herein shall have the meanings ascribed in the Application.

**ORDERED**, that subpoenas authorized by this Order may be served by FedEx or any other method of service permitted under Bankruptcy Rule 9016 or by other means agreed to by the subpoenaed parties; and it is further

**ORDERED**, that any subpoena issued pursuant to this Order shall provide at least 14 days notice to the recipient to provide the recipient an opportunity to object to the subpoena or to file any motion with the Court; and it is further

**ORDERED**, if any entity or person who receives a subpoena for the production of documents pursuant to this Order withholds any document on the basis of an asserted privilege, that entity is directed to provide a privilege log in accordance with Bankruptcy Rule 7026 to the Togut Firm, One Penn Plaza, Suite 3335, New York, New York 10119, Attn.: Steven S. Flores, Esq., so as to be received with the document production required by the subpoena, or at such time as mutually agreed to by the Trustee and the subpoenaed entity or person; and it is further

**ORDERED**, that entry of this Order is without prejudice to the rights of the Trustee to apply for any other or further relief, including but not limited to further relief under Bankruptcy Rule 2004; and it is further

**ORDERED**, that the Court shall retain jurisdiction to hear and determine any and all matters arising from the interpretation and/or implementation of this Order.

Dated: New York, New York  
January \_\_, 2018

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HONORABLE ROBERT D. DRAIN  
UNITED STATES BANKRUPTCY JUDGE